

Ms. Erinn D. Larkin  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Human Rights Campaign PAC (Amended 12 Day Pre-General Report)  
Identification Number: C00235853

Dear Ms. Larkin:

This letter responds to your requests for additional information dated January 23, 2009 regarding HRC PAC's Amended 12 Day Pre-General Report and follows a telephone conversation we had with you on February 18, 2009 to discuss and clarify your requests.

1. Your letter states that HRC PAC filed 48-hour notices for three independent expenditures that were not disclosed on Schedule E supporting Line 24 of the Detailed Summary Page. As discussed by telephone, in all three cases we reported the amount of the expense on the 48-hour notice based on a vendor estimate, which changed when we received the final invoice. All three independent expenditures were reported on Schedule E for the final invoiced amounts. Pursuant to your advice, we will amend the Pre-General Report to add memo entries noting the variances between the amounts reported in the 48-hour notice and on Schedule E.

2. Your letter states that we may have failed to file one or more of the required 48-hour notices for independent expenditures that were reported on Schedule E. The request identifies nine independent expenditures.

a. As discussed by telephone and described above, five of the identified independent expenditures were reported on Schedule E for the final invoiced amount, which changed from the amount of the expense reported in the 48-hour notice. Thus, HRC PAC did file 48-hour notices for the following identified expenditures: Human Rights Campaign on 10/1/2008, R.R. Donnelley on 10/2/2008 (3 expenditures), and Associated Press on 10/2/2008. Pursuant to your advice, we will amend the Pre-General Report to add memo entries noting the variances between the amounts reported in the 48-hour notice and on Schedule E.

b. HRC PAC did file a 48-hour notice for an expenditure to the US Postal Service on 10/2/2008 in the same amount that was reported on Schedule E.

c. During our telephone conversation, you acknowledged that 48-hour notices were not required for two expenditures to the Human Rights Campaign on 10/3/08 that did not meet the \$10,000 aggregation threshold.

d. A 48-hour notice was inadvertently not filed for one independent expenditure, to Eidolon Communications on 10/1/08. When HRC PAC discovered that a payment had been made to this vendor as an independent expenditure, an amendment was made to the Pre-General Report to correct the omission.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz, HRC Assistant General Counsel, at (202) 572-8914.

Sincerely,

Jim Rinefied  
Treasurer

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